

MEMO ENDORSED

GUZOV, LLC



October 14, 2021

Hon. Valerie Caproni
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Saccani Distributing Company. v. Clean Cause, Inc., et al.,*
No. 1:21-cv-07942-VEC

Dear Judge Caproni:

We are counsel to defendant Clean Cause, Inc. (“Defendant”) in the referenced action. Pursuant to Your Honor’s Individual Practice Rules, we write to request (1) that the enclosed Stipulation Extending Time To Respond To Complaint to November 12, 2021 (“Stipulation”) be so-ordered by the Court, and (2) that the Initial Pretrial Conference (“IPTC”) scheduled for October 22, 2021 be adjourned by the Court to December 10, 2021.

By Order dated September 23, 2021, this action was transferred to this Court from the United States District Court for the Eastern District of California. During the pendency of the transfer motion, the parties refrained from taking any further action with regard to the Complaint, which was originally filed by plaintiff Saccani Distributing Company (“Plaintiff”) in the Superior Court of California, Sacramento County on May 8, 2020 (the “Complaint”). This firm was only retained by Defendant to represent it in this action earlier today. The requested extension is thus necessary to provide us with adequate time to consult with Defendant, review the underlying documentation in the case, and prepare an appropriate response to the Complaint. As set forth in the Stipulation, the parties have agreed to extend Defendant’s deadline to respond to the Complaint to November 12, 2021. Accordingly, Defendant hereby requests that the Stipulation be so-ordered by the Court.

The parties further jointly request that the IPTC currently scheduled to be held by telephone on October 22, 2021, be adjourned by the Court to December 10, 2021. This adjournment is requested to permit the parties adequate time to confer on a Civil Case Management Plan and Scheduling Order once issue has been formally joined by Defendant upon the filing of its response to the Complaint.

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Defendant has conferred with counsel for Plaintiff, who is copied on this letter, and they have consented to the requests herein. This is the first request for an extension concerning the deadlines referenced in this letter.

Respectfully submitted,

GUZOV, LLC

A handwritten signature in blue ink, appearing to read "Debra J. Guzov", is written over a horizontal line.

Debra J. Guzov (DJG-7125)

cc: Counsel for Plaintiff (via ECF)

Application GRANTED.

The initial pretrial conference, currently scheduled for Friday, October 22, 2021 at 2:30 P.M., is adjourned to **Friday, December 10, 2021 at 11:30 A.M.** Pre-conference submissions are due no later than **Thursday, December 2, 2021**. For a description of the pre-conference submissions requirements and the conference dial in information, the parties should consult the Court's order at docket entry 15.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written in the lower left of the red-bordered box.

Date: October 14, 2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE